

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:)
)
Tarache L. Armstead,) Bankruptcy No. 22-21694
) Chapter 13
Debtor) Document No.
)
Tarache L. Armstead,) Prior bankruptcy case filed at case no.
) 18-22843 GLT
Movant) Dismissed on April 11, 2022.
)
vs.)
)
Ronda J, Winnecour, Trustee, West Penn)
Power, Verizon, U.S. Department of)
Education, PHEAA, Pennsylvania American)
Water Company, Merrick Bank, Kingston)
Data and Credit International, Columbia Gas)
of Pennsylvania, Chatham University, Cecil)
Township Municipal Authority, Atlas)
Aquisitions LLC, Canon McMillan School)
District, Internal Revenue Service, Monera)
Financial, Pennsylvania Department of)
Revenue, Select Portfolio Servicing, Inc,)
American First Finance,)
)
Respondent(s))

MOTION TO EXTEND THE AUTOMATIC STAY

AND NOW, comes the debtor, Tarache L. Armstead, by and through her attorney, Christopher M. Frye and Steidl and Steinberg, and respectfully represents as follows:

1. This case was commenced on August 31, 2022 when the debtor filed a voluntary petition under Chapter 13 of the Bankruptcy Code.
2. The debtor filed a prior Chapter 13 bankruptcy case on July 16, 2018 at Case No. 18-22843 GLT that was dismissed without prejudice on April 11, 2022.
3. During the prior Chapter 13 case, the Debtor paid in \$143,219.00 to the Chapter 13 Trustee from July 16, 2018 through April 11, 2022.
4. The debtor owns a cleaning business which she operates as a sole proprietor.

5. When the COVID pandemic hit in March 2020, the Debtor lost a tremendous amount of business revenue and it has taken time for business revenue to come back from the decrease.
6. Business revenue has increased steadily as of late and even since the dismissal of the prior Chapter 13 in April 2022.
7. Further, in addition to the cleaning business, the debtor was employed full-time by UPMC as a nurse during the prior case earning approximately \$65,000.00 per year.
8. Since the dismissal of the prior Chapter 13 case, the debtor obtained new employment in August 2022 with Maxim Staffing as a travelling nurse.
9. The Debtor is employed full time at the new position (40 hours per week) making \$100.00 per hour for a yearly rate of \$208,000.00 per year, which is an incredibly substantial increase in waged earnings compared to what the was income in the prior case.
10. Based on the increase in business revenue, the increase in waged earnings from employment, and the substantial amount paid to the Chapter 13 Trustee in the prior case, the Debtor believes that there is ample cause for the automatic stay to be extended beyond 30 days in this case.

WHEREFORE, the debtor, Tarache L. Armstead, respectfully requests this Honorable Court extend the automatic stay beyond thirty days.

Respectfully submitted,

August 31, 2022
DATE

/s/ Christopher M. Frye
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